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Attorneys for the EB-5 Investors listed on Exhibit A

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re

Lucky Dragon Hotel & Casino, LLC

Debtor.

Lead Case No.: 18-10792-LED

Joint Administration with:
 Bankr. Case No.: 18-10850-LED

Chapter 11

**VERIFIED STATEMENT AND
 DISCLOSURE REGARDING EQUITY
 SECURITY HOLDERS IN A CHAPTER
 11 CASE**

In re

Lucky Dragon, LP,

Debtor.

I, Ryan J. Works, Esq., declare as follows:

1. I am over eighteen years of age. Except as otherwise indicated, if called as a witness, I could and would competently testify to the matters set forth in this *Verified Statement and Disclosure Regarding Equity Security Holders in Chapter 11 Cases*.

2. I am a partner with McDonald Carano LLP ("McDonald Carano"), located at 2300 W. Sahara Ave., Suite 1200, Las Vegas, Nevada 89102, and have been licensed to practice law in the State of Nevada, and this Court since October of 2004.

3. McDonald Carano hereby enters its appearance as counsel in the above captioned

1 matters, for those certain EB-5 equity security holders, limited partners, and investors (the “EB-5
2 Investors”), a list of which is attached hereto as **Exhibit A**.¹ This *Verified Statement and*
3 *Disclosure Regarding Equity Security Holders in Chapter 11 Cases* is being filed pursuant to
4 Federal Rule of Bankruptcy Procedure (“FRBP”) 2019.

5 4. The EB-5 Investors are acting in concert to advance their common interests
6 pursuant to FRBP 2019(b)(1)(A) and are not composed entirely of affiliates or insiders of one
7 another pursuant to FRBP 2019(b)(1)(B).

8 5. Pursuant to FRBP 2019(c)(1), a group of EB-5 Investors (118 at present) have
9 formed a committee to act on behalf of the EB-5 Investors (the “Committee”), which committee
10 members, and its chair-person, are also named in the attached **Exhibit A**.

11 6. Each of the EB-5 Investors have invested no less than \$500,000 in the Lucky
12 Dragon LP. Such investors are referred to as EB-5 Investors because their investment is, in part,
13 made to become eligible for permanent residency in the United States pursuant to the EB-5
14 Program administered by the United States Citizenship and Immigration Services.

15 7. Upon information and belief, the EB-5 Investors have agreed by powers of attorney
16 that the Committee has the authority to act on their behalf.

17 8. Upon information and belief, the Committee has not been hired or employed in any
18 way by the EB-5 Investors. McDonald Carano LLP has been hired by the EB-5 Investors, through
19 the Committee, to represent their collective interests in the above captioned cases, administratively
20 consolidated as Bankruptcy Case No. 18-10792.

21 9. Upon information and belief, each of the EB-5 Investors has a substantial
22 economic, and equity interest in these cases. It is unknown at present when each of the EB-5
23 Investors acquired such interests; however, a supplemental Verified Statement and/or Disclosure
24 will be filed when and if necessary.

25
26
27 ¹ The address of each individual EB-5 Investor is unavailable currently. The schedule of equity
28 security holders, filed by the Lucky Dragon LP, included addresses of agents or attorneys of EB-
5 Investors, that are not individual addresses. McDonald Carano reserves the right to
supplement addresses to **Exhibit A** if and when necessary.

10. I declare under penalty of perjury under the laws of the United States and Nevada that the foregoing is true and correct to the best of my knowledge.

DATED this 6th day of April, 2018.

McDONALD CARANO LLP

By: /s/ Ryan J. Works

Ryan J. Works, Esq. (NSBN 9224)

Attorneys for the EB-5 Investors listed on Exhibit A

4840-1317-1552, v. 2

EXHIBIT A

EXHIBIT A

The Member of Lucky Dragon EB-5 Investor Committee List as follows:

Chairman of the Committee:

LI, Peiyi

The member of the Committee:

ZHONG, Chao

YANG, Jianbo

LIU, Dengwei

CHEN, Jin

LIAO, Xu

LI, Qiuqiong

CHEN, Jingxuan

HUANG, Ying

ZHANG, Xiaodong

ZHAO, Jun

The list of Lucky Dragon EB-5 Investors who selected McDonald Carano LLP as follows (By the end of March 29, 2018, Total Number: 118):

CHEN, Huiyi	LI, Qing
CHEN, Jin	LI, Qiuqiong
CHEN, Jingxuan	LI, Rong
CHEN, Junpeng	LI, Shuying
CHEN, Lin	LI, Wanling
CHEN, Minna	LI, Xiaofan
CHEN, Xianna	LI, Xiurong
FU, Huaiyang	LI, Yifang
FU, Zhirong	LI, Zizhang
HAN, Xiaoping	LIANG, Yanyan
HE, Caixian	LIANG, Yihui
HE, Hanxiao	LIAO, Qilong
HOU, Jian	LIAO, Wenjian
HUANG, Xiaoying	LIAO, Xu
HUANG, Zemin	LIU, Liangcheng
JIANG, Xin	LIU, Dan
LAN, Hongren	LIU, Dengwei
LEI, Chao	LIU, Fang
LENG, Bo	LIU, Minyi

LI, Jianyu	LIU, Tingbin
LI, Liqun	LIU, Xiaodong
LI, Peiyi	LIU, Xiaohui
LIU, Xudong	WANG, Zhengming
LIU, Yan	WANG, Zixuan
LIU, Yirang	WEN, Qun
LIU, Yixi	WU, Fei
LIU, Yiming	WU, Jinglan
LU, Jian	WU, Jingling
LUO, Haowen	WU, Jun
MIAO, Xiujuan	WU, Yunjian
MO, Shaomei	XIANG, Fang
PAN, Hongyi	XIAO, Yao
PAN, Jianhua	XIE, Biyu
PAN, Qianjie	XING, Tian
QU, Chen	YAN, Xiaoqing
SHEN, Ruifang	YANG, Fuyun
SU, Jing	YANG, Zixun
WANG, Chunhua	YE, Jiaxin
Wong Tak Kam	YE, Jinyun
WANG, Lili	YE, Xiaolin
WANG, Li	YU, Benjamin

WANG, Xiang	ZHANG, Hongying
WANG, Hongying	
ZHANG, Junli	SUN, Zeyun
ZHANG, Ruiyun	WANG, Rui
ZHANG, Yingying	WANG, Yunyi
ZHANG, Yumei	ZHANG, Hao
ZHANG, Zhiyan	XU, Xiaona
ZHAO, Guoli	ZENG, Shaofang
ZHAO, Shida	CHEN, Na
ZHONG, Chao	JIN, Jiandong
ZHOU, Jiqing	LIANG, Xiaoyuan
ZHOU, Siyao	QIN, Zuyun
ZHOU, Yanxin	LI, Zehua
ZHU, Lihua	LIN, Lizhen
ZHU, Ying	HONG, Yang
HE, Yetian	CHEN, Xin
LUO, Xinyi	HUANG, Ying
YANG, Yanzhao	LIANG, Xiaoyuan
ZHAO, Qing	